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October 5, 2021

Hon. Laura Taylor Swain  
U.S. District Judge  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

**MEMO ENDORSED**

Re: *US v. Jackson, et. al {Johnny Stevens}*, 21 cr 537 (LTS)

Dear Judge Swain:

I am counsel for Johnny Stevens, a defendant in the above referenced matter.

On September 30, 2021, following his arrest, Mr. Stevens was presented before Magistrate Gorenstein and arraigned on the above referenced Indictment. During the proceeding, Mr. Stevens was released on a recognizance bond which, *inter alia*, included a condition that Mr. Stevens be placed on home detention but be allowed to leave the home for employment.

Mr. Stevens has two jobs. He is a construction worker and a delivery service driver. During the course of the construction job, he travels to different job sites. Similarly, the delivery service job requires him to travel to different locations. I am informed by Mr. Steven's supervising pretrial services officer, Joshua Rothman, that this type non-stationary employment is not conducive to a home detention bond condition as an individual's activity cannot be appropriately monitored by pretrial services. As such, in order to accommodate Mr. Stevens' employment, he requests the bond condition be modified so that, instead of home detention, a curfew condition (to be determined by pretrial services) be imposed. He informs this will alleviate any potential bond condition conflict when Mr. Mr. Stevens travels to different job sites and makes deliveries.

Accordingly, I respectfully request the bond be modified as specified herein.

I have conferred with the Government and they consent to the request.

Respectfully submitted,

/s/

Jeffrey G. Pittell

cc: Jacob Gutwillig, AUSA  
Joshua Rothman, USPTO

The foregoing modification request is granted for the reasons stated above. Docket entry no. 13 is resolved.  
SO ORDERED. 10/5/2021 /s/ Laura Taylor Swain, Chief USDJ